

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
RS FIT NW LLC,)	
)	Case No. 20-11568 (KBO)
Debtor.)	
)	(Jointly Administered)
<hr/>)	
)	
24 HOUR FITNESS WORLDWIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL CASUALTY COMPANY;)	Adv. Pro. No. 20-51051 (KBO)
ENDURANCE AMERICAN SPECIALTY)	
INSURANCE COMPANY; STARR SURPLUS)	
LINES INSURANCE COMPANY; ALLIANZ)	
GLOBAL RISKS US INSURANCE COMPANY;)	
LIBERTY MUTUAL INSURANCE COMPANY;)	
BEAZLEY-LLOYD'S SYNDICATES 2623/623;)	
ALLIED WORLD NATIONAL ASSURANCE)	
COMPANY; QBE SPECIALTY INSURANCE)	
COMPANY; and GENERAL SECURITY)	
INDEMNITY COMPANY OF ARIZONA,)	
)	
Defendants.)	
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**PROPERTY INSURER DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND
INCORPORATED MEMORANDUM OF LAW**

EXHIBIT A-14

*Excerpts from the Deposition of Jeremy Gottlieb
(6/17/2022)*

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re:	:	Chapter 11
24 HOUR FITNESS	:	Case No. 20-1158(KBO)
WORLDWIDE, INC., et	:	(Jointly Administered)
al.,	:	
	:	
Debtors.	:	
	:	
24 HOUR FITNESS	:	
WORLDWIDE, INC.,	:	
Plaintiff,	:	
	:	
vs.	:	Adv. Pro. No.
	:	20-51051(KBO)
	:	
CONTINENTAL CASUALTY	:	
COMPANY; ENDURANCE	:	
AMERICAN SPECIALTY	:	
INSURANCE COMPANY;	:	
STARR SURPLUS LINES	:	
INSURANCE COMPANY;	:	
ALLIANZ GLOBAL RISKS	:	
US INSURANCE COMPANY;	:	
LIBERTY MUTUAL	:	
INSURANCE COMPANY;	:	
BEAZLEY-LLOYD'S	:	
SYNDICATES 2623/623;	:	
ALLIED WORLD NATIONAL	:	
ASSURANCE COMPANY;	:	
QBE SPECIALTY	:	
INSURANCE COMPANY;	:	
and GENERAL SECURITY	:	
INDEMNITY COMPANY OF	:	
ARIZONA,	:	
	:	
Defendants.	:	

- - -
DEPOSITION OF JEREMY GOTTLIEB

FRIDAY, JUNE 17, 2022

12:03 P.M.

- - -

REPORTED BY:

Jean M. Walker, Court Reporter - Notary Public

APPEARING REMOTELY FROM CAMDEN COUNTY, NEW JERSEY

1 Exhibit-2 for your deposition.

2 (Exhibit-2, remotely introduced
3 and provided electronically to the
4 reporter.)

5 BY MR. DENN:

6 Q. Looking at this document, and I can tell
7 you when it was provided to us, it was attached to
8 the e-mail you just looked at. Does this appear to
9 be a claim report that was generated for you by
10 Natalie Peterson at 11:59 a.m. on March 24th, 2020?

11 A. It appears so.

12 Q. This would be a collection of the type of
13 incident reports that you and I were just discussing
14 a few minutes ago?

15 A. That's correct.

16 Q. What she has done, based on looking at
17 this document, is done a search from March 1st of
18 2020 to March 24th of 2020 of any incident reports
19 that contain corona, coronavirus, COVID or COVID-19?

20 MR. O'CARROLL: Objection to
21 form.

22 THE WITNESS: That's how it
23 appears on this document.

24 BY MR. DENN:

25 Q. Okay. She indicated, in the e-mail we

C E R T I F I C A T I O N

I, Jean M. Walker, do hereby
certify:

That prior to being examined,
the witness in the foregoing proceedings
was by me duly sworn to testify to the
truth, the whole truth, and nothing but
the truth;

That said proceedings were taken
remotely before me at the time and place
therein set forth and were taken down by
me in shorthand and thereafter transcribed
into typewriting under my direction and
supervision;

I further certify that I am
neither counsel for, nor related to, any
party to said proceedings, not in anywise
interested in the outcome thereof.

In witness thereof, I have
hereunto subscribed my name.

Dated: June 17, 2022

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Court Reporter - Notary Public

(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means,
unless under the direct control and/or
supervision of the certifying reporter.)